

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In RE:

RESIDENTIAL CAPITAL, LLC, et al.,
Post-Effective Date Debtors

Chapter 11
Case No. 12-12020-mg

RICHARD D. RODE,
Creditor-Beneficiary

-against-

RESCAP BORROWER CLAIMS TRUST, and
RESCAP LIQUIDATING TRUST,
Objectors

DECLARATION IN SUPPORT OF MOTION FOR RELIEF FROM DEADLINE FOR
SUBMISSION OF JOINT, PROPOSED PRE-TRIAL ORDER
(CLAIM NOS. 5610 AND 5612)

Wendy Alison Nora declares, under penalty of perjury pursuant to 28 U.S.C. sec. 1746:

1. She is the attorney for Richard D. Rode.
2. She was taken ill on June 9, 2016 and was suffering from a fever when she prepared the Motion for Relief from the Deadline of June 17, 2016 for the submission of the proposed Joint Pre-Trial Conference Order.
3. She was hoping she would recover from the health condition in time to work with opposing counsel to meet the deadline, but she is still afflicted with the condition and was instructed by her physician's office to be seen at Urgent Care today.
4. Among the symptoms she has been suffering since June 9, 2016 are mild cognitive impairments including word choice, logistics and conceptualization.

5. The symptoms seem to be related to hypoxia from her underlying asthma which has been flaring as result of the acute infection.

6. She has been unavailable to work with opposing counsel on the proposed Joint Pre-Trial Order since she filed the Motion for Relief on June 10, 2016.

7. She is informed and believes that opposing counsel will be filing their proposed Pre-Trial Order today.

8. She will ask the Court for accommodations for the filing of Mr. Rode's separate Pre-Trial Order at the scheduling conference to be held on June 22, 2016 at 2:00 p.m. Eastern Daylight Time.

FURTHER YOUR DECLARANT SAYETH NAUGHT.

/s/ Wendy Alison Nora

Wendy Alison Nora

DECLARATION OF SERVICE

Wendy Alison Nora declares, under penalty of perjury, that she filed the foregoing Declaration in Support of Motion for Relief from Deadline for Joint Pre-Trial Order by CM/ECF on June 17, 2016 and thereby served all parties capable of service by CM/ECF.

/s/ Wendy Alison Nora

Wendy Alison Nora